

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ROBERT STOUD

Plaintiff

v.

SUSQUEHANNA COUNTY

Defendant

CIVIL ACTION

No. 3:17-CV-2183

**MOTION TO EXTEND DEADLINE FOR SUPPLEMENT TO
EXPERT REPORTS**

NOW COMES, the Plaintiff, Robert Stoud, by and through his counsel, and in support of this motion, avers as follows:

1. Pursuant to an Order dated September 13, 2019 (Doc. 52), the Court set a deadline of December 12, 2019 for Plaintiff to file his supplemental expert report.
2. The Plaintiff seeks an Order to extend the deadline for supplementary expert reports.
3. The Defendant has no expert, but Plaintiff is in need to file a supplementary report because Plaintiff received relevant discovery from the Defendant after the discovery deadline and after Plaintiff timely filed his initial expert report.
4. The requested extension will not unreasonably delay trial.

5. Plaintiff's counsel contacted defense counsel on December 11, 2019 and December 12, 2019 seeking concurrence. As of the time of filing this motion, Plaintiff's counsel has not gotten a response.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court extend the deadlines for Plaintiff's supplementary expert reports.

Respectfully Submitted:

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire
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/s/ Christopher J. Szewczyk, Esquire
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Valvano
321 Spruce Street
Suite 201
Scranton, PA 18503
P: (570) 348-0776
F: (570) 348-2755

Date: December 12, 2019

CERTIFICATE

The undersigned hereby certifies that on December 11, 2019 and December 12, 2019, he contacted A. James Hailstone, Esquire requesting concurrence in the foregoing motion. As of the filing of this motion, no response has been received.

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire
Mazzoni, Karam, Petorak, and
Valvano
321 Spruce Street
Suite 201
Scranton, PA 18503
(570) 348-0776

Dated: December 12, 2019

CERTIFICATE OF SERVICE

I, Gerard M. Karam, Esquire, hereby certify that I have served a true and correct copy of the foregoing document via electronic service/ECF system on the 12th day of December, 2019.

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire